

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
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<i>Counsel to the Plan Administrator</i>	
In re:	Chapter 11
BED BATH & BEYOND INC., <i>et al.</i> , ¹	Case No. 23-13359 (VFP)
Debtors.	(Jointly Administered)

**CERTIFICATION OF NO OBJECTION REGARDING
MOTION OF PLAN ADMINISTRATOR FOR ENTRY OF AN ORDER
(I) AUTHORIZING THE SETTLEMENT OF AD VALOREM TAX CLAIMS OF
TEXAS TAXING AUTHORITIES, (II) AUTHORIZING THE USE OF \$2.8 MILLION
SET ASIDE TO SATISFY CLAIMS OF TEXAS TAXING AUTHORITIES, AND
(III) GRANTING RELATED RELIEF [DOCKET NO. 2928]**

1. On March 12, 2024, Michael Goldberg, in his capacity as Plan Administrator (the “Plan Administrator”) for the Wind-Down Debtors established in the above-captioned case, by and through his undersigned counsel, filed the *Motion of Plan Administrator for Entry of an Order (I) Authorizing the Settlement of Ad Valorem Tax Claims of Texas Taxing Authorities, (II)*

¹ The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained on the website of the Debtor’s proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>.

Authorizing the Use of \$2.8 Million Set Aside to Satisfy Claims of Texas Taxing Authorities, and (III) Granting Related Relief [Docket No. 2928] (the “Motion”).

2. The Plan Administrator served the Motion on March 12, 2024, upon the parties listed in the *Certificate of Service* [Docket No. 2929].

3. Pursuant to the *Notice of Hearing on Motion of Plan Administrator for Entry of an Order (I) Authorizing the Settlement of Ad Valorem Tax Claims of Texas Taxing Authorities, (II) Authorizing the Use of \$2.8 Million Set Aside to Satisfy Claims of Texas Taxing Authorities, and (III) Granting Related Relief* [Docket No. 2928-1], the deadline for parties to file objections and responses to the Motion was on April 2, 2024 (the “Objection Deadline”). No objections or responses to the Motion were filed on the docket on or before the Objection Deadline. The Plan Administrator has not received any informal responses to the Motion on or before the Objection Deadline.

4. The proposed order (the “Proposed Order”) that was appended to the Motion is attached hereto as **Exhibit A**. The Plan Administrator respectfully requests that the Court enter the attached Proposed Order at the earliest convenience of the Court.

Dated: April 8, 2024

/s/ Colin R. Robinson

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